

Louth Playgoers Society Limited



Summary

Policy Title

Data Management Policy

Policy Governance

The following table identifies who is accountable, responsible, informed or consulted with in regard to this policy.

- Responsible – the person(s) responsible for developing the policy
- Accountable – the person who has ultimate accountability and authority for the policy
- Consulted – the person(s) or groups to be consulted prior to final policy implementation or amendment
- Informed – the person(s) or groups to be informed after policy implementation or amendment.

Responsible	Chairman of the Board
Accountable	Theatre Manager
Consulted	Board
Informed	All employees and Volunteers

Introduction

Data protection law:

The General Data Protection Regulation (GDPR) applies in the UK and across the EU from May 2018. It requires personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research or statistical purposes shall not be considered to be incompatible with the initial purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by GDPR in order to safeguard the rights and freedoms of individuals;
- Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

Our Commitment

All personal data will only be processed in accordance with Data Protection Law.

The Company will appoint a Data Protection Officer (DPO) who will be responsible for ensuring that appropriate **data protection governance** arrangements and controls are in place.

Louth Playgoers Society Ltd. will create and maintain **Records Management** processes for managing all electronic and manual records containing personal data. This should include consideration of timely and secure destruction.

The Company will have a Data Subject Rights Procedure to clearly state how requests relating to a data subject's rights are to be dealt with. This will include dealing with **Subject Access Requests (SARs)**.

The Company will ensure that all employees receive sufficient **data protection training** and associated information relating to their roles and responsibilities.

Louth Playgoers Society Ltd. will design and operate suitable procedures and controls to allow for the **sharing of information** only in ways that comply with Data Protection Law.

Our Responsibilities:

Louth Playgoers Society Ltd. needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

Everyone at Louth Playgoers Society Ltd. contributes to compliance with GDPR. Key decision makers must understand the requirements and accountability of the organisation sufficiently to prioritise and support the implementation of compliance. All staff, Directors and Volunteers are responsible to ensure GDPR compliance. These include:

- Keeping the Theatre Management and board updated about data protection issues/risks.
- Embedding ongoing privacy measures into corporate policies and day-to-day activities, throughout the organisation and within each business unit that processes personal data. The policies themselves will stand as proof of compliance.
- Dissemination of policy across the organisation, and arranging training and advice for staff
- Dealing with subject access requests, deletion requests and queries from clients, stakeholders and data subjects about data protection related matters
- Checking and approving contracts or agreements with third parties that may handle the company's sensitive data
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards
- Performing regular checks and scans to ensure security hardware and software is functioning properly
- Evaluating any third-party services, the company is considering using to store or process data, to ensure their compliance with obligations under the regulations
- Developing privacy notices to reflect lawful basis for fair processing, ensuring that intended uses are clearly articulated, and that data subjects understand how they can give or withdraw consent, or else otherwise exercise their rights in relation to the companies use of their data
- Ensuring that audience development, marketing, fundraising and all other initiatives involving processing personal information and/or contacting individuals abide by the GDPR principles

Data Protection Officer

Data Protection Officer (DPO) – the person responsible for fulfilling the tasks of the DPO in respect of Louth Playgoers Society Ltd. is [Neil Warne, Board Director].

The minimum tasks of the DPO are:

- To inform and advise the Board of Directors, volunteers and its employees about their obligations to comply with the GDPR and other data protection laws.
- To monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments; train staff and conduct internal audits
- To be the first point of contact for supervisory authorities and for individuals whose data is processed (employees, customers etc)

Using third Party processors

The Company will inevitably require the services from a range of service providers, where processing arrangements will require the sharing of personal data with the supplier.

Louth Playgoers Society Ltd. will ensure that, in such circumstances, appropriate contracts and/or Information Sharing Agreements are in place. Currently Louth Playgoers Society Ltd. share data with Seat Advisor (Theatre Booking system) and Audience Finder (Arts Council UK). This information is only used by publicly-funded arts organisations in England to better understand their audiences and improve their cultural offer.

Breaches and Offences

All **data loss/breaches** and near misses are reported to the DPO.

Any deliberate breach of the rules and procedures identified in this Policy and associated Framework documentation will likely constitute an offence according to the law and, if proven, could result in disciplinary action.

The Company has a policy of self-reporting all significant breaches to the ICO, and will do so within 72 hours, as defined in the GDPR and in the Company's Breach Management Procedure.

Louth Playgoers Society Ltd. will ensure that adequate insurance cover is in place to protect against the possible financial implications of data breach and/or cyber-attacks.

Privacy Impact Assessments

Louth Playgoers Society Ltd will undertake Privacy Impact Assessments (PIAs - also known as Data Protection Impact Assessments, DPIAs) as standard practise. This is a tool which can help identify the most effective way to comply with their data protection obligations and meet individuals' expectations of privacy and protect against the risk of harm through use or misuse of personal information.

The DPIA will contain:

- A description of the processing operations and the purposes, including, where applicable, the legitimate interests pursued by the controller.
- An assessment of the necessity and proportionality of the processing in relation to the purpose.
- An assessment of the risks to individuals.
- The measures in place to address risk, including security and to demonstrate that you comply.

Subject access requests

All individuals who are the subject of data held by your company are entitled to:

- Ask what information the company holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligations

All Subject Access requests must be put in writing to the Data Protection Officer, Louth Playgoers Society Ltd. at its registered address or sent by email to dpo@louthplaygoers.co.uk. Any subjects access requests will be acknowledged within one week and completed within the statutory 28 days.

Privacy notices

Louth Playgoers Society Ltd. aims to ensure that individuals are aware that their data is being processed. The company's privacy notice can be found on the Riverhead theatres website.